

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Name and address of Plaintiff:

Christopher Batch 1713-2018  
2000 South Grande Blvd  
Greensburg, PA 15601

v.

Full name, title, and business address  
of each defendant in this action:

1 Joson Lauricia  
100 N Westmoreland Ave  
Greensburg PA 15601-0436

2 Chris Hanigan  
40 North Pennsylvania Ave Court house Annex  
15611 Greensburg PA 15601

Use additional sheets, if necessary  
Number each defendant.

RECEIVED

AUG 20 2019

CLERK, U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

Plaintiff brings this action against the above named and identified defendants on the following cause of action:

I. Where are you now confined? Westmoreland County Prison

What sentence are you serving? N/A

What court imposed the sentence? N/A

II. Previous Lawsuits

A. Describe any and all lawsuits in which you are a plaintiff which deal with the same facts involved in this action. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs N/A

Defendants

2. Court (if federal court, name the district; if state court, name the county) and docket number

3. Christopher Feliciani  
2 North Main street  
Greensburg PA 15601-2402

4 John Petrush  
2 North Main St Ste 206  
Greensburg PA 15601

5 J. Lazar  
2 North main st Ste 206  
Greensburg PA 15601

6. Jason Morgan  
100 N. Westmoreland Ave  
Greensburg PA 15601-0436

~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~

V. Did the incident of which you complain occur in an institution or place of custody in this District?

If so, where?

N/A

and answer the following questions:

A. Is there a prisoner grievance procedure in this institution?

Yes ( ) No (x)

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ( ) No (x)

C. If your answer is YES,

1. What steps did you take?

N/A

2. What was the result?

D. If your answer is NO, explain why not:

There wasn't a  
grievance procedure in this case

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?

Yes (x) No ( )

F. If your answer is YES,

1. What steps did you take? Spoke to a counselor

2. What was the result? It was out of their  
hand

VI. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I want compensated for the damage that  
has occurred and release from this county jail

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND  
CORRECT.

N/A  
3. Name of judge to whom case was assigned N/A

4. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A  
5. Approximate date of filing lawsuit N/A

6. Approximate date of disposition N/A

B. Prior disciplinary proceedings which deal with the same facts involved in this action:

Where? N/A

When? \_\_\_\_\_

Result: \_\_\_\_\_

III. What federal law do you claim was violated? My 4th 5th 8th  
6th 9th and 14th

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

A. Date of event: 5-09-18

B. Place of event: Greensburg PA

C. Persons involved--name each person and tell what that person did to you: Complaint has been  
attached

8-15-19  
(Date)

Christopher Bates 'pro se'  
(Signature of Plaintiff)

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Plaintiff:

Christopher Batch

V.

Defendant:

Joseph Lauricia,

Chris Flanigan, Christopher  
Feliciani, John Petrush, J  
Lazar, Jason Morgan

Complaint

I Jurisdiction & venue

This is a civil action authorized by 42 U.S.C. Section 1983 to redress the deprivation, under color of state law, of rights secured by the constitution of the United States. The Court has jurisdiction under 28 U.S.C. Section 1331 and 1343 (a)(3).

Plaintiff seeks declaratory relief pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff's claims for injunctive relief are authorized by 28 U.S.C. Section 2283 and 2284 and Rule 65 of Federal Rules of Civil Procedure.

2. The western district of Pennsylvania is an appropriate venue under 28 U.S.C. Section 1341 (b)(2) because it is where the events giving rise to this claim occurred

II Plaintiffs

- 3 Plaintiff Christopher Batch is and was at all times mentioned here in a prisoner of the Westmoreland County Prison

### III Defendant(s)

4. Defendant Joseph Lauricia is a State trooper of Pennsylvania (Greensburg) who at all times mentioned in this complaint was an off duty State trooper and is employed by the State trooper bureau of greensburg at all times relevant to this action

5 Defendant Chris Flanigan is the magistrate Judge of greensburg. she is legally responsible for the operation of the bail and is employed by the county of westmoreland at all times relevant to this action

6. Defendant Christopher Feliciani is the county Judge of westmoreland. He is legally responsible for the operation of the bail and detention of Plaintiff. He is employed by the County of Westmoreland at all times relevant to this action

7. Defendant John Petrush is the DA of westmoreland County. He is legally responsible for the operation of criminal Cases in westmoreland at all times relevant to this action

8. Defendant Jason Morgan is a State trooper of Pennsylvania (Greensburg) who at all times mentioned was employed by the State trooper bureau of greensburg at all times relevant to this action

9. Defendant J. Lazar is the DA of westmoreland County. He is legally responsible for the operation of criminal Cases in westmoreland at all times relevant to this action

10 Each defendant is sued individually and in his/her official capacity at all times mentioned in this complaint all said defendants acted under the Color of State law

#### IV Facts

11. On May 9, 2018 I was driving through the city of Greensburg when I was stopped at a red light on West Otterman Street and North Main.
12. I noticed a baby blue sedan in the right turning lane with a white male as the driver
13. The driver in the sedan (later known as Joseph Lauricia) kept letting go of his breaks and revving his engine as if he was trying to see into my car or get my attention
14. As I noticed these actions of (Joseph Lauricia) it made me very much aware of him and made me pay attention of his actions for my safety.
15. As the light turned green I pulled off going straight and watching my rearview of the sedan
16. As Joseph Lauricia was making a right turn. I watched him stop in mid turn and start to travel behind my car. By him making a illegal turn
17. Since the lane Joseph Lauricia was in was a turning lane only. I kept an eye on the driver for the fear of my life because now this man was following me
18. In fear of my life I made a right hand turn onto N. Pennsylvania to head to a residential area for the safety of my life
19. Joseph Lauricia went straight and made a right hand turn onto College Road. where he eventually gets behind me once again
20. As I made my turn I thought I was safe because Joseph Lauricia went straight. which helped my nerves to calm down
21. As I got back on to College Road. heading the direction I was originally going to take. The blue sedan again flew up behind me with his high beams on



22. In fear of my life I took off. I made a few right turns and founded a residential area for my safety and parked my car on N. Maple Street in Greensburg PA.

23 When I was about to get out of my car the emergency lights of a Police vehicle came on from the baby blue sedan

24. The same white male (Joseph Lauricia) from the red light on Westotterman and N. Main came to my car and asked "Who are you"

25. I responded by asking who he was because he was not dressed as a Police officer

26. He then indicated he was a State trooper and quickly flashed a gold badge. Then asked me for my licence & registration. Which I complied to due because he had a gun showing as if he needed to quickly draw it

27. Joseph Lauricia asked who car I was driving because I didn't fit the discription of the vehicle.

28 I told Joseph Lauricia it was my car and he went and ran the Plates information

29 He came back and asked again who car it was I was driving as he gave back my Paperwork. I told Joseph Lauricia again that it was my car (a S80 Volvo sedan)

30 Joseph Lauricia indicated that it was not my car and had me step out of my car Placing me in handcuffs

31 Lauricia then indicated that he smelled me and I and my car smelled like weed

32. I told Joseph Lauricia that I didn't have no weed on me or in my car

33. Joseph Lauricia Patted me down and went inside my basketball shorts Pocket, To Find no weed and about \$20 dollars.

34. Joseph Lauricia at this time had waved off an on duty Greensburg Police officer and waited for other State troopers to arrive

35. Joseph Lauricia Started Searching my car without my Consent. As did a second officer (who name is unknown at this time)

36. The second officer asked Joseph Lauricia about my locked glove department. Joseph Lauricia indicated to the second officer to go ahead and we have his keys.

37. Joseph Lauricia then threw my car keys to this second officer. who unlocked my glove department with out my Consent.

38 Still Shacken up I was told by Joseph Lauricia in a threateningly manner that either I help myself or my Charges would be worst.

39. Joseph Lauricia kept asking me If I could get him 10 or more bricks of dope (heroin)

40. I ~~don't~~<sup>told</sup> him that I don't know people that sold clope and was then Placed in a marked State trooper car and taken to Greensburg State trooper head Quarters

41 At~~the~~ Station Joseph Lauricia again kept threaten me about Setting someone up and telling me to help myself or it can get worst.

42. At this time Jason Morgan was also Present. He to Started telling me how Cody Smith already told them he Sold me all the guns and that I was the man. That I need to help myself out before it get worst.

43. At this time I asked what he meant, and he indicated to me that I was a smart guy I would figure it out

44. once being told this I was in fear of my life because I didn't know what Jason Morgan or Joseph Lauricia were up to.

45. I was finally taken to WCP where I was arraign in front of Chris Flanigan. She gave me an excessive bail of \$400,000 dollars straight.

46. When I asked why was my bail so high for a non-violent case. She said "You want me to make it higher and told me to get out her face.

47. This caused more stress because I knew that I was going to lose my home and job that I made \$1500 a week doing construction

48. After being arraign I was given my property slip which stated I had \$274

49. Inside my console I had \$600 dollars. Meaning that Joseph Lauricia or the second cop had taken my money

50. When my mother got my car out the impound the next day. She told me that they broke all my air vents, my glove department and ripped my back seats out

51. Christopher Feliciani held a suppression hearing on Feb, 15, 2019. On June 20<sup>th</sup> 2019 Christopher Feliciani suppressed all evidence in Plaintiff's Case.

52. Plaintiff counsel sought immediate restoration of plaintiff freedom due to the lack of prima facia and the state not able to have a winning verdict at a trial

53 Christopher Feliciani denied making any decision because he wanted to await John Petrush and see what he wanted to do with the Plaintiff (Plaintiff counsel can be a witness to this matter)

54. On July 22, 2019 Plaintiff had a modify bond hearing that was continued until July 31, 2019 because Christophe Feliciani wanted a risk assessment done

55 on July 31, 2019 Christopher Feliciani denied Plaintiff a bond reduction and kept Plaintiff bail at \$ 400,000 dollars straight and to remain detain in WCP.

56. Christopher Feliciani reason of denying Plaintiff his liberty was because he didn't like what Plaintiff got arrested with which was all the evidence that he suppressed on June 20<sup>th</sup>

57. meaning that Christopher Feliciani was Punishing Plaintiff for the wrongful acts of Joseph Lauricia

58. J. Lazar who filled in on July 31, 2019 for John Petrush opening argument was nothing more than using suppressed evidence to request Plaintiff to be detain until appeals were over. which knowingly would violate Plaintiff 6<sup>th</sup> amendment to a Speedy trial as well as his 5<sup>th</sup>

59 John Petrush on July 22, 2019 as well used suppressed evidence as his argument to deny Plaintiff his rights for his freedom and bond

60 John Petrush, J. Lazar and Christopher Feliciani with there outrageous acts and abuse of Authority have Violated Plaintiff 5<sup>th</sup> 6<sup>th</sup> 8<sup>th</sup> 9<sup>th</sup> & 14<sup>th</sup> amendment

61. Jason Morgan who was not involved in Plaintiff Case. Had kept his word to Plaintiff. When telling him it can get worst. Jason Morgan made false allegations against Plaintiff by stating in a affidavit that Plaintiff made numerous allegations about an individual in another case

62 This caused me to protect my life for people tried to harm me behind Jason Morgan false allegations.

### V Legal Claims

63, Plaintiff Batch Reallege and incorporate by reference Paragraphs 1-62

64 The malicious arrest, false imprisonment, emotional distress, defamation anguish distress, destructibility, theft, malice, reverse discrimination negligence and pain and suffering violated Christopher Batch rights and constituted Cruel and Unusual Punishment, a due Process Violation, malicious Prosecution, abuse of Process, Under Color of State law, Civil Rights Conspiracy, under the 4th, 5th, 6th, 8th, 9th and 14th amendment to the United States Constitution

65. The Plaintiff has no plain, adequate or complete remedy at law to redress the wrongs described herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants unless this court grants the declaratory and injunctive relief which Plaintiff seeks

### VI Prayer For Relief

WHEREFORE, Plaintiff respectfully prays that this court enter judgment granting Plaintiff

66 A declaration that the acts and omissions described herein violated Plaintiff's rights under the Constitution and laws of the United States

67 A Preliminary and Permanent injunction ordering defendant Christopher Feliciani to release Plaintiff from Westmoreland County Prison ASAP

68. a Preliminary and Permanent injunction ordering defendant Joseph Lauriccia to wear state attire at all time on duty as well as not profile people because of his self ignorance as well pay Plaintiff missing funds ASAP.

69. ~~Plaintiff~~ A Preliminary and Permanent Injunction ordering defendant Chris Flanigan to stop giving out excessive bail and having a second opinion all looked at by another Judge before giving the accused a bail

70 A Preliminary and Permanent Injunction ordering Christopher Feliciani to release the accused People back to there State of freedom if there is no evidence to take a defendant to trail

71 Actual damages in the sum of \$ 106,500 against Joseph Lauriccia Jointly & Severally

72 Compensatory damages in the amount of \$ 300,000 against each defendant, Jointly and Severally

73 Punitive damages in the amount of \$ 300,000 against each defendant, Jointly and Severally

74 Hedonic damages in the amount of \$ 100,000 against each defendant, Jointly and Severally

75 Nominal damages in the amount of \$ 458,000 against each defendant, Jointly and Severally

76 A Jury trial on all issues triable by jury

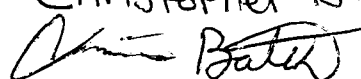
77 Plaintiffs costs in this suit

78 any additional relief this Court deem just proper and equitable

Dated: 8-15-19

Respectfully Submitted

Christopher Batch

 (pro-se)

3000 South Grande blvd

Greensburg, PA 15601

## Verification

I have read the foregoing Complaint and hereby verify that the matters alleged therein are true except as to matters alleged on information and belief, and as to those, I believe them to be true. I certify under Penalty of Perjury that the foregoing is true and correct

Executed at Greensburg, PA on 8-15-19

Christopher Batch (Pro-se)

Christopher Batch